

Before the  
Federal Communications Commission  
Washington, DC 20554

In the Matter of	)	
	)	
Petition for Waiver of	)	
FCC Form 471 Filing Deadline	)	
	)	
Lubbock Public Library System	)	CC Docket No. 02-6
(Lubbock, Texas, BEN 141984)	)	
	)	
Schools and Libraries Universal Service	)	
Support Mechanism	)	

**Petition for Waiver of  
FCC Form 471 Filing Deadline for Funding Year 2017  
RE: FCC Form 471 BEN 141984**

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**I. INTRODUCTION AND SUMMARY**

The Lubbock Public Library system ("The Library") serves the 294,000 citizens of Lubbock County, Texas, through four physical locations, as well as providing substantial online services. The City of Lubbock (population 244,000) is the largest city in the South Plains region of West Texas. Its nickname, "Hub City," derives from its unique role as the economic, educational, and health care hub of the multicounty region, north of the Permian Basin and south of the Texas Panhandle. Since the E-Rate Program's implementation in 1998, Lubbock Public Library has been a very small but successful participant, has received annual telecommunications reimbursements for seventeen years.

The Library submitted and certified its Funding Year 2017 FCC Form 471 # 171038537, in the "Apply Online" portal of the Schools and Libraries Division ("SLD") of the Universal Service Administrative Company's ("USAC") website, on June 2, 2017, twenty-two days after the FCC Form 471 filing deadline of May 12, 2017. A manager at The Library has "sandwiched" E-Rate into a demanding workload for the past 8 years, and has been the primary staff member performing E-Rate duties until 2016. Recently, an additional "technology savvy" Library Computer Specialist has been included to provide information and advice in the application process.

Multiple unanticipated and unavoidable obstacles resulted in the late filing of the Form 471.

- **EPC Portal**  
Although the two staff members tasked with applying for E-Rate funding in the previous two years attended USAC training for all of the upcoming changes, there were ongoing problems and confusion navigating the EPC Portal for both Forms 470 and 471.

Further complicating the remedial FCC waiver process, after The Library filed the Form 471 out-of-window, there were ambiguous instructions and inaccurate terminology regarding how to proceed with actual filing the FCC waiver. Thus, The Library did not immediately file its waiver request because it was expecting additional communications from USAC about the process (such as an "official" denial letter or message; instructions on how to appeal USAC's denial; and *then* instructions on the FCC waiver process, as had been told to the staff by one source).

- **Municipal Impediments**

As a city entity, the library must follow municipal and state regulations for the posting of RFPs connected with the Form 470. This requirement greatly increased the level of difficulty and added substantial time-consuming impediments. As a result, the contract required by the Form 471 was not signed by city officials until June 1, 2017, twenty-one days after the filing window closed. Upon receipt of the signed contract, the library completed and submitted the Form 471 on the following day, June 2, 2017.

- **Insufficient Filing Window and Lack of Familiarity with the New Process**

Because 2017 was the first year that the EPC Portal was used exclusively for E-Rate filings, complications arose that had not previously been encountered by the filing team. This, in turn, led to insufficient time to address issues and errors that presented themselves. Due to the unfamiliarity with the new filing method, the Library staff often had to stop mid-process to ask questions and investigate the proper course of action. This, combined with the municipal impediments previously mentioned, created a situation in which the two staff members responsible for filing were placed in a position wherein their ability to meet deadlines was dependent upon outside factors, and often beyond their own control. The staff responsible filed as quickly as they were able, but as this was a learning experience, with very little flexibility due to the insufficient filing window, they were unable to meet the required deadline.

## II. REQUEST

The Library respectfully petitions the Commission to request a waiver of the Funding Year 2017 FCC Form 471 filing deadline on behalf of the Lubbock Public Library to allow the Out of Window submission of their E-Rate Funding Year 2017 FCC Form 471 #171038537, due to problems with the EPC Portal, municipal impediments, and an insufficient filing window.

Respectfully submitted,



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